

1 Jorge Alejandro Rojas  
2 [Rojas.jorge96@gmail.com](mailto:Rojas.jorge96@gmail.com)

3 Plaintiff in Pro Se  
4 557 Cambridge Way  
5 Bolingbrook, IL 60440  
6 424-219-1582

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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

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11 JORGE ALEJANDRO ROJAS,  
12 Plaintiff,  
13 v.  
14  
15 UNPLUGGED MEDIA, LLC, et al,  
16 Defendants.  
17

18 Case No. 2:23-cv-02667-AH-KS

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20 **DECLARATION OF JORGE  
ALEJANDRO ROJAS IN SUPPORT  
OF REQUEST TO CONTINUE  
MOTION HEARING AND REQUEST  
FOR ELECTRONIC APPEARANCE  
VIA ZOOM**

21 I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

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- 23 1. I am the Plaintiff in this case, and make the following statements based on my  
24 personal knowledge and records. If called to testify concerning any of these  
25 statements, I will be able to do so.
- 26 2. I make the statements in this declaration in support of Plaintiff's Request to Continue  
27 Hearing and Plaintiff's Request for Electronic Appearance via Zoom.
- 28 3. On June 17, 2025 I e-mailed both Defendant Christopher Gutierrez Cuenza  
("Cuenza") and Alexander Bykhovsky ("Bykhovsky"), seeking conferral. Plaintiff  
specifically asked Defendants position on a motion for continuing the hearing date

1 and provided the proposed new hearing dates. Plaintiff has not received a response  
2 as of this filing.

3 4. On June 23, 2025, Plaintiff texted Cuenza at a telephone number the parties have  
4 texted in the past, following up on the conferral request, and did not receive a  
5 response.

6 5. I am on pre-arranged travel to Annapolis, Maryland, on the date of the hearing (July  
7 30, 2025). I will be there for a series of meetings and conferences as part of my  
8 employment. The conference has been scheduled since at least early 2025 and I will  
9 be presenting on several important aviation industry topics as part of my job  
10 responsibilities at a conference with approximately 50+ attendees which cannot be  
11 rescheduled and for which I am an essential presenter at.

12 6. I am employed as a Systems Engineer, for a government contractor, and reside and  
13 work in a suburb of Chicago, Illinois. I occasionally travel for work – and will be  
14 on travel for work during the current scheduled hearing.

15 7. My work schedule primarily consists of Monday through Friday, nine hours of work  
16 per day.

17 8. My current schedule for the requested dates the hearing is continued to (August 6 or  
18 August 13) would necessitate that I miss at least one, and possibly two days of work  
19 to attend the hearing in person, as I would travel from Chicago, Illinois. If I were to  
20 attend the hearing virtually the period which I miss would be shorter as I would not  
21 need to travel as well as be more economical because I would not need to purchase  
22 air fare. I would also need to arrange for someone to take over any customer  
23 meetings or commitments that I have for my position. Being able to attend the  
24 hearing virtually would allow for reduced interruption to my work schedule due to  
25 the associated travel and mitigate compression of my schedule.

26 9. I believe that attending a continued hearing virtually via Zoom would allow me the  
27 ability to answer any questions or concerns the Court has at oral argument  
28 concerning the pending requests to set aside default judgments.

1 10.I will not be enforcing the judgment as to the moving defendants while the motion  
2 to set aside default is pending.

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4 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
5 and correct. Executed on June 29, 2025, in Bolingbrook, IL.

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8 Jorge Alejandro Rojas  
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